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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

Case No. 07-5944 SC

MDL No. 1917

This Document Relates to:

ALL INDIRECT PURCHASER ACTIONS

**STIPULATION AND [PROPOSED]  
CASE MANAGEMENT ORDER RE  
INDIRECT PURCHASER  
PLAINTIFFS' SECOND  
CONSOLIDATED AMENDED  
COMPLAINT**

1 WHEREAS, on February 5, 2010, Special Master Charles A. Legge issued  
2 his Report, Recommendations and Tentative Rulings Re: Defendants' Motions to Dismiss  
3 by which he denied in part and granted in part Defendants' Motions to Dismiss;

4 WHEREAS, on March 30, 2010, the Court issued an Order Approving and  
5 Adopting Special Master's Report, Recommendation and Tentative Rulings Re:  
6 Defendant's Motions to Dismiss ("Motion to Dismiss Order"), by which the Court, *inter*  
7 *alia*, granted the Indirect Purchaser Plaintiffs ("Plaintiffs") leave to amend certain of the  
8 claims in Plaintiffs' Consolidated Amended Complaint;

9 WHEREAS, on May 10, 2010, Plaintiffs filed a Second Consolidated  
10 Amended Complaint amending certain claims as provided in the Motion to Dismiss Order  
11 and purporting to state certain additional claims not referenced in the Motion to Dismiss  
12 Order;

13 WHEREAS, the parties desire to expedite resolution of the substantive issues  
14 raised by the amended and putative additional claims asserted in Plaintiffs' Second  
15 Consolidated Amended Complaint and to minimize the burdens on the parties, the Court,  
16 and the Special Master, but not to prejudice Defendants as to any defenses that would have  
17 been available to them in opposition to a Motion for Leave to File Plaintiffs' Second  
18 Consolidated Amended Complaint;

19 IT IS HEREBY STIPULATED AND AGREED, by and between counsel for  
20 the undersigned Plaintiffs and Defendants, that:

21 1. As to any amended or additional claims asserted in Plaintiffs' Second  
22 Consolidated Amended Complaint, Defendants shall file a joint Motion to Dismiss by  
23 June 25, 2010.

24 2. Plaintiffs shall file their papers in opposition to Defendants' Motion to  
25 Dismiss by July 16, 2010.

26 3. Defendants shall file their papers in reply to Plaintiffs' opposition by  
27 July 30, 2010.

1           4.     The hearing on Defendants' Motion to Dismiss shall be held on  
2 August 24, 2010, or on such other date as the Special Master may select.

3           5.     Defendants shall not contend that the Plaintiffs' Second Consolidated  
4 Amended Complaint is not properly filed, however, Defendants retain all rights that they  
5 would otherwise have to assert any and all defenses to the amended and putative additional  
6 claims asserted in Plaintiffs' Second Consolidated Amended Complaint that could have  
7 been raised in opposition to a Motion for Leave to File Plaintiffs' Second Consolidated  
8 Amended Complaint, including without limitation any defense that they would otherwise  
9 have that such claims do not "relate back" to the filing date of Plaintiffs' Consolidated  
10 Amended Complaint for purposes of the applicable statute(s) of limitations.

11 Dated: May 25, 2010

12 By: /s/ Mario N. Alioto  
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19 ***Interim Lead Counsel for the Indirect***  
20 ***Purchaser Plaintiffs***

1 Dated: May 25, 2010

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Tianjin Samsung SDI Co., Ltd.,  
And On Behalf of All Other Defendants*

15 Pursuant to General Order, § X-B, the filer attests that concurrence in the  
16 filing of this document has been obtained from each of the above signatories.

18 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

20 DATED: May 28, 2010

Charles A. Legge  
Hon. Charles A. Legge  
United States District Judge (Ret.)  
Special Master

24 DATED: 6/3/10

